

STATEMENT OF NAIF AL DAHMASHI

I, Naif Al Dahmashi, declare as follows:

1. I am employed by Al Rajhi Bank (the "Bank"), and my current title is Assistant General Manager Operations Control and Governance. I have been employed by the Bank since April 2001, and have held my current position since June 2019. I am over the age of eighteen. I am submitting this statement based on my personal knowledge of the current processes and systems for archiving and retrieving the Bank's records, and my inquiries regarding the history of the Bank's archiving processes and systems. I am competent to testify to the best of my knowledge about the information in this statement.
2. I understand that the Plaintiffs in the September 11, 2001 litigation against the Bank in the United States have requested that the Bank produce various documents to them. I also understand that the Plaintiffs mostly request that the Bank search for documents between January 1, 1992 and December 31, 2002.
3. I understand that most of the Bank's documents from the period 1992 through 2002 would have been created as hardcopy documents, which are currently stored in the Bank's archives.

The Bank's Document Archives

4. The Bank's archiving facility is known as the Archive Center. The Archive Center is the current central location for archiving Bank documents. The Archive Center includes four warehouses located in Al Sulay, Riyadh. The operation of the Archive Center is outsourced to a service provider.



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شركة الراجحي المصرفية للاستثمار

شركة سعودية مساهمة برأس مال: 25,000,000,000. رقم السجل التجاري: 1010000096. الرقم الوطني الموحد: 7000102744
صندوق بريد: 28، الرياض: 11411 المملكة العربية السعودية. هاتف: +966 11 2116000. تليكس: 406317
العنوان الوطني: 8467 طريق الملك فهد - حي المروج، وحدة رقم (1)، الرياض. 12263 - 2743.
رقم الترخيص: 1420. وخاضعة لرقابة وإشراف البنك المركزي السعودي.

Al Rajhi Banking & Investment Corp. Bank

Saudi Joint Stock Corp. With a Capital of S.R. 25,000,000,000. C.R. No: 1010000096, National Unified No: 7000102744.

P O Box: 28, Riyadh 11411 Kingdom of Saudi Arabia. Tel: +966 11 2116000 Telex 406317.

National Address: 8467 King Fahd Road - Al Muruj Dist, Unit No (1) Riyadh 12263 - 2743.

Lic No: 1420. Subjected to Saudi Central Bank Supervision and oversight.

www.alrajhibank.com.sa

5. The Bank's Archive Center stores hard copies of all documents archived by the Bank.
Some of those documents have been scanned.
6. The four warehouses in Al Sulay, Riyadh currently store approximately 2.25 million boxes on floor-to-ceiling racks in these facilities. For security purposes, the warehouses are not lit and the boxes received for archiving are stored in randomized locations on the warehouse shelves, so that no particular location is associated with any particular source of documents. The average number of pages stored per box ranges between approximately 1,500 to 4,000, depending on the size of the papers.
7. I understand that in late 2010 the Bank implemented the O'Neill system to replace the manual spreadsheet system for maintaining an index of all boxes of documents received by the Archive Center for storage.
8. The O'Neill system does not index the documents inside each of the boxes. The specific contents of a box cannot be searched without retrieving and searching through that box.
9. To use the O'Neill system to identify the warehouse and rack location of boxes of hardcopy documents, the following information is required:

- Hardcopy transaction documents from Branches: (i) the transaction date, and (ii) the Branch number.
- Other hardcopy documents from the Head Office, Regional Offices and Branches: (i) the date the documents were received by the Archive Center, or any date range specified on the boxes or courier slips by the sending department; and (ii) either the office number (or in some cases the department) from which the documents were sent for archiving, or, for Branch documents, the document category. Boxes cannot be located by document date or employee name.



10. Given the age of the documents that are requested by the Plaintiffs, the quality of the paper and the ink may affect whether any hardcopy document is still legible and can be successfully scanned for digital review.
11. Some of the Bank's archived documents have been scanned, and the images can be retrieved from the Bank's FileNet system.
12. The contents of documents scanned before 2015 generally are not digitally searchable. I understand that the Bank implemented character recognition technology only in 2015 and only for the scanning of transactional documents. Documents received by the Archive Center prior to 2015 would have to be processed or re-scanned with character recognition technology to be searchable.

Process to Retrieve Potentially Relevant Documents from the Bank's Archives

13. I understand that the Plaintiffs in this litigation have requested documents from as early as 1992 and as late as 2004. These requests would require the Bank to search its archives. For example, I understand that the Plaintiffs' Request No. 1 for production of documents seeks "all documents" related to accounts and communications with certain supposed customers, and states that the documents "shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails," as well as "documents detailing the opening of and/or closing of the account(s), account signatories, Know-Your-Customer and/or other customer due diligence reports, suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit

work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.”

14. The contents of the Bank’s archived documents from the period requested by the Plaintiffs cannot be digitally searched, and the documents cannot be identified by employee, author, or counterparty.
15. I have been asked to estimate the volume of potentially responsive documents for the period 1999 through 2001. Based on a review of the O’Neill system, the Archive Center stores approximately 114,420 boxes of documents from the period 1999 through 2001 that are listed in potentially relevant categories identified by the Bank. This volume of boxes would amount to approximately 286 million pages of documents, based on an estimate of 2,500 pages per box. (This total does not reflect approximately 279,811 boxes for which the receipt date is not listed in the O’Neill system.) Of the 114,420 boxes, approximately 13,049 boxes do not contain transaction documents that can be selected by combination of transaction date and Branch.
16. The Bank would incur costs to prepare the documents for review. The boxes of documents would have to be retrieved from the Archive Center warehouses, and the documents would have to be scanned and processed for character recognition.
17. Based on a review of the FileNet system, approximately 66 million pages of the potentially relevant documents from the period 1999 through 2001 may have already been scanned, but those scanned pages are not searchable and would need to be re-scanned or processed for character recognition.
18. The Archive Center charges the Bank a fee of SAR 4 per box for retrieval and a fee of SAR 0.085 per page for scanning or character recognition processing. If the Bank is



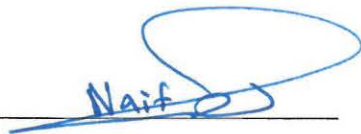
required to review all 114,420 boxes of potentially relevant documents, the cost to retrieve the un-scanned boxes from the warehouses would be approximately SAR 457,680 (or approximately \$122,048), and the cost to scan the un-scanned pages and process for character recognition the pages stored on the FileNet system would be approximately SAR 24,314,250 (or approximately \$6,483,800).

19. I understand that the Plaintiffs' other requests similarly seek, for example, "correspondence," "notes," "memoranda," "reports," "reviews," or "action plans," or else seek "all documents" concerning certain topics. Given the time period of the documents that the Plaintiffs are requesting, any of these types of documents that the Bank possesses would be stored in the Bank's Archive Center, and many would only be in hardcopy.

I state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Riyadh, Saudi Arabia on 1 September 2021.

By: _____


Naif Al Dahmashi

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